



Amber Doe
P.O. Box 20
8306 Wilshire Blvd.
Los Angeles, CA 90211
Phone 424- 379- 3619
amberlitigate@gmail.com
Propia Persona

UNITED STATES DISTRICT COURT
DISTRICT OF
Los Angeles
For removal to The Supreme Court of the United States
Writ of Certiorari In Preparation

Amber Doe,)	Case No. CV23-2280-MEMF(SK)
)	
Plaintiff,)	
)	
vs.)	STATEMENT IN SUPPORT OF OBJECTION TO
)	JUDGE Steve Kim; DECLARATION OF
Michael Lewis Goguen, Sequoia Capital, Two)	Amber Doe; EXHIBITS, Court Record,
)	MEMORANDUM OF POINTS AND
Bear Capital, Quinn Emanuel, Wilson, Sonsini,)	AUTHORITIES
)	
Goodrich& Rosati, Goodwin Procter, The United)	DEPT: 8B
)	JUDGE: CV23-2280-MEMF(SK)
States of America, Cristopher Reynolds, Galser)	
)	
Weil, Bisnar Chase, Nemeck and Cole, San)	
)	
Mateo Court Orange County Court, Oranch)	
)	
Couty, San Mateo County, See Interested parties)	

Be sure to remove these notices before using this document.
TO THE CLERK OF THIS COURT AND ALL OTHER INTERESTED PARTIES AND
THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that **CAPACITY OF PARTY SUCH AS PLAINTIFF,**

1 Amber Doe HEREBY OBJECTS to the Hon. **NAME OF JUDGE TO WHICH OBJECTION IS**
2 **MADE Judge Steve Kim** presiding at any further hearings or proceedings concerning this action.
3 Said objection is based on the grounds and upon the facts set forth in the declaration of Amber Doe
4 and exhibits attached thereto, concurrently filed and served herewith and incorporated herein by
5 reference.
6

7 Dated May 18, 2023

Amber Doe
Amber Doe

DECLARATION OF Amber Doe

I, Amber Doe declare as follows:

1. I am a party to this action and am over the age of 18 years. I have personal firsthand knowledge of the facts set forth herein and if called as a witness could and would testify competently to the truth of the facts set forth herein.

2. I make this declaration in support of my objection to the Hon. Steve Kim presiding at any further proceedings in this action.

3. The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the grounds that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint for human trafficking rape premises liabilities and 241 additional causes of action and violations of the law The fee waiver should have been granted as I have declared under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases where my situation of human trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still has not been granted by Hon. Steve Kim.

Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful defendants has no law degree and is in dire need of medical treatment which has been removed from her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is denied Legal Aid And public Counsel.

In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and

1 refused to serve a single pleading or notice to Amber Doe although she makes several demands for
2 service of the pleadings per week.

3 Amber Has today the Court that she is not Being served legal pleadings discovery motions or
4 anything related to at least tree cases where she is either the plaintiff or defendant.
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7 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the
8 Lawyers in this case since Feb 2014. It is Now May 2023.
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11 Amber Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From Hon.
12 Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor can
13 she see underrated pleadings because they are not on pacer.
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16 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear
17 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint
18 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim
19 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of
20 humanity.
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24 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the
25 entire constitution of the Untied States of America would be come invalid if this abuse of process
26 continues. The Constitution extends to all humans not only the rich and the guilty and for those who
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1 the court feels deserve a trial by Jury. All humans are equal in the eyes of the law whether they are
2 slaves or not.

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5 My rights can not be invalidated by the mis use of the illegally procured "Gag Order" in the form of
6 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has
7 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person
8 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as
9 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first
10 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after
11 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt
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13 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they
14 knew the hearing was set for 9:00 am and they did not provide payoff of the court room nor the
15 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or
16 defend herself.
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21 The Court Denied Amber Does request for E-filing for no reason. It is mandatory for the lawyers to
22 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will
23 cause her a pre-mature death. She has no money to pay for shipping fees for filings she has no money
24 for paper and printing services. E-filing is extended to mostly everyone else and is better for the
25 environment. The request for exiling should have been granted.
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1 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and
2 People without lawyers are allowed and instructed to email the clerk and the clerks email them in
3 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed
4 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy
5 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default
6 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did
7 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers
8 plaintiff would not be requesting a hearing time from the deputy clerk.
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14 4. A person aware of the facts might reasonably entertain a doubt that the judge would be
15 able to be impartial in that only 50 days after the filing of this complaint which includes California
16 State Judges that Violated plaintiffs Civil rights while acting under the color of the law Hon. Steve
17 Kim has shown the same prejudice to Amber Doe. A true and correct copy of the court record is
18 available on pacer and in the courts system
19
20

21 5. I first became aware of the grounds for disqualification of judge when the 5th business
22 day had passed after my fee waiver was enter with the court and Hon. Steve Kim Failed to sign it. I
23 Then diligently explained my circumstances and position in my response to the order to Show Cause
24 in less than 10 pages. An additional 20 days later my fee wavier has still not been signed in an
25 attempt o stymie my ability to serve international defendants in the case.
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1 No Denial of my request for fee waiver has been entered by the court thus preventing plaintiff from
 2 refiling her case and being appointed new Judge in the Federal court that will not prejudice and
 3 stigmatize plaintiff and allow the defendant and his army of lawyers to continue to obstruct the civil
 4 and criminal judicial process. This disqualification must take place in the name of fair access to the
 5 courts by all and to prevent further violations of my human rights, constitutional rights and civil
 6 rights. I and am presenting this verified statement at the earliest possible opportunity.
 7

8 **6. The Court record speaks for itself**
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10 7. In this case, Judge Steve Kim exceeded the bounds of reasonable conduct for a
 11 judge seeking to exercise control of the proceedings and reach an unfair and efficient result.

12 8. The behavior of Judge Steve Kim involved conduct that clearly did not afford me a
 13 reasonable opportunity to be heard and present my evidence. The obligation of a judge to dispose of
 14 matters promptly and efficiently must not take precedence over the judge's obligation to dispose of
 15 the matters fairly and with patience. For example the Canons of Judicial Ethics state in pertinent part
 16 that, when a litigant is self-represented, a judge has the discretion to take reasonable steps,
 17 appropriate under the circumstances and consistent with the law and the canons, to enable the litigant
 18 to be heard. ... *Cannon 3, Advisory Comm. Commentary*, Page 17, Lines 24-30.
 19
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23 9) Judge Steve Kim knows or reasonably should know that the list of defendants included defendants
 24 in international countries and hundreds of defendants in the united states and Canada so there is no
 25 possible way for the instant case to be a secret and has sealed the case with no reason to do so as all
 26 defendants and plaintiff have the right to read review and cross-examine the defendants and plaintiffs
 27 on the evidence. Defendants Michael Lewis Goguens requests for the Judges and the government to
 28

1 cover up his sex trafficking conspiracy are an obstruction of justice and a slap in the face to his
2 victims of which there are a great many.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct and that this declaration is executed on May 18, 2023 at Los Angeles, California.
5

6
7 I, Amber Doe declare that:

8 I am a party to this action.

9 My testimony and all attachments and contents thereof. I declare that the same is true of my
10 own knowledge, except as to those matters which are therein stated upon my information and belief,
11 and to those matters I believe them to be true.
12

13 I declare under penalty of perjury under the laws of the State of California, that the foregoing
14 is true and correct.

15 Executed this 18th day of May, 2023, at Los Angeles , California.
16

17 *Amber Doe*

18 Amber Doe
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24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 **I.**

26 **STATEMENT OF FACTS** 27 28

1 This case is **CIVIL ACTION For Human Trafficking Rape And 242 additional causes of**
2 **action and Violations of the law by the perpetrator Michael Lewis Goguen his lawyers**
3 **companies agents “investigators” and all people hired by them.** Quinn Emanuel lawyers have
4 acted in **SUPREME ABSOLUTE MALICE** and have obstructed justice on behalf of
5 Micheal Lewis Goguen for over 9 years and Victimized Amber Doe
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9 Amber Doe objects to the Hon. Steve Kim presiding at any further hearings or proceedings
10 concerning this action on the grounds that a person aware of the facts might reasonably entertain a
11 doubt that the judge would be able to be impartial in that he as already been made aware that
12 Plaintiffs rights have been violated and that she is not being served the pleadings or times and dates
13 that QuinnEmanuel who are both witnesses and defendants in the case are going before the judge and
14 obtaining his signature on legal documents refer to court record.
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19 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the
20 grounds that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint
21 for human trafficking rape premises liabilities and 241 additional causes of action and violations of
22 the law The fee waiver should have been granted as I have declared under penalty of perjury that I
23 can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases
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25 lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still
26 has not been granted by Hon. Steve Kim.
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1 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful
2 defendants has no law degree and is in dire need of medical treatment which has been removed from
3 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is
4 denied Legal Aid as well as public Counsel because she is suing Lawyers who will obstruct justice
5 and overwhelm their limited resources with hundreds of thousand of legal documents.
6

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8 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and
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27 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim
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2 humanity.

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5 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the
6 entire constitution of the untied states would be come invalid if this abuse of process continues. The
7 Constitution extends to all humans not only the rich and the guilty and for those who the court feels
8 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.
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12 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has
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21 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or
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2 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will
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II.

ARGUMENT

A. CALIFORNIA LAW STATES THAT A JUDGE IS DISQUALIFIED WHERE THEY HAVE A FINANCIAL INTEREST IN A PARTY TO THE ACTION OR FOR ANY REASON OTHER PERSONS AWARE OF THE FACTS MIGHT REASONABLY ENTERTAIN A DOUBT THAT THE JUDGE WOULD BE ABLE TO BE IMPARTIAL AND A JUDGE’S BIAS TOWARDS A PARTY IS CLEARLY A GROUND FOR DISQUALIFICATION

California law states that a judge is disqualified where, for any reason:

1 “The judge has a financial interest in the subject matter in a proceeding or in a party to the
2 proceeding”. See *Code of Civil Procedure* § 170.1(a)(3)(A)

3 “Other persons aware of the facts might reasonably entertain a doubt that the judge would be
4 able to be impartial”. See *Code of Civil Procedure* § 170.1(a)(6)(A)(iii).

5
6 *Code of Civil Procedure* §170.5 states in pertinent part that, “For the purposes of Sections 170
7 to 170.5, inclusive, the following definitions apply:

8 (a) “Judge” means judges of the superior courts, and court commissioners and referees.

9
10 (b) “Financial interest” means ownership of more than a 1 percent legal or equitable interest
11 in a party, or a legal or equitable interest in a party of a fair market value in excess of one thousand
12 five hundred dollars (\$1,500), or a relationship as director, advisor or other active participant in the
13 affairs of a party, except as follows:

14
15 The test for impartiality is objective in that “The situation must be viewed through the eyes of
16 the ... average person on the street” as of the time the motion is brought. *United Farm Workers of*
17 *America v. Sup.Ct. (Maggio, Inc)*. (1985) 170 Cal. App. 3d 97, 104 (emphasis added).

18
19 “The word ‘might’ in the statute was intended to indicate that disqualification should follow if
20 the reasonable man, were he to know all the circumstances, would harbor doubts about the judge's
21 impartiality.” *United Farm Workers of America v. Sup.Ct. (Maggio, Inc.)*, supra, 170 Cal.App. 3d at p.
22 104 (emphasis added).

23
24 Judge Steve Kim also exhibited bias towards Amber Doe in that The Hon. Steve Kim is
25 disqualified to preside at any further proceedings in this action on the grounds that: This case was
26 filed March 28th 2023. Within 5 days of the date of filing the complaint for human trafficking rape
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 5 plaintiff would not be requesting a hearing time from the deputy clerk.
 6

7
 8 Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a
 9 certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a
 10 party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist*
 11 *Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.
 12

13
 14 **B. THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**
 15 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**
 16 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**
 17 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**
 18 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**
 19 **DUE PROCESS**
 20

21 The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and
 22 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him
 23 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the
 24 United States Supreme Court.
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1 The California Supreme Court has stated that the, "Statutes governing disqualification for
2 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants
3 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.

4 The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair
5 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)
6 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the
7 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where
8 the party requesting disqualification has not complied with any applicable state disqualification
9 statutes, and that a showing of actual bias is not required for judicial disqualification under the due
10 process clause.

11 "The Due Process Clause entitles a person to an impartial and disinterested tribunal..."
12 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,
13 (2004) 224 Cal.App.4th 665, 674.

14 The well-established common law rule is that recusal is required when a judge has a direct,
15 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556
16 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.

17 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,
18 Standards of J Admin 10.20; Cal Rules of Ct, *Code of Judicial Ethics*, Canon 3B(5).

19 "(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the
20 performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be
21 perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex,
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gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, or (2) sexual harassment. “

Judge also have a duty to require lawyers in proceedings before them to refrain from manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).

“(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation against parties, witnesses, counsel, or others.”

Judges have a duty to allow every party to a legal proceeding the full right to be heard according to law. *Code of Judicial Ethics*, Canon 3B(7).

“(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, full right to be heard according to law.”

C. Amber Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF THEIR OBJECTION see court record no filing has been served on Amber Doe by defendants yet they have procured multiple signatures from Hon. Steve Kim on their pleading that they have not served Plaintiff nor have they provided her the signed copies and she has no access to a credit card as Quinn Emanuel tampered with Amber Does banks and demanded they remove her access to all credit products inclusive of credit cards so she has no ability to pay for downloads from Pacer or the Orange County Court website in the court where the Judges are allowing proceedings to move forward against Amber Doe with no regard for the fact that the lawyers are conspiring together to obtain \$ 100 million dollars for no reason while Amber Doe suffers

1 debilitating medical conditions caused by defendants abuse and has no shelter because of
2 defendants abuse and continues to be stalked by multiple men that she does not know. Amber
3 Doe has no ability to download more than the limited \$30 per quarter in documents from pacer.
4 Infurtherance of the aforementioned The Judges/Justices are aware that the illegally procured
5 “gag order” and the Illegal selling of the case to cover Up the crimes committed against
6 Plaintiff do not extend to the Courts in Canada, England ,France, Japan, Puerto Rico, The
7 Virgin Islands, China or any other country where Amber Doe was trafficked and must file cases
8 against defendants so that she can finally gain her freedom and obtain Medical treatment,
9 Food, Shelter, Safety and Peace.
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14 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

15 In *DCH Health Servs. Corp. v Waite* (2002) 95 Cal.App. 4th 829, 833 a California Court of
16 Appeal stated that recusal may be required on the basis of a mere appearance of impropriety.

17 Other cases decided by the California Courts of Appeal have stated that actual bias need not
18 be present. *Roitz v Coldwell Banker Residential Brokerage Co.*, (1998) 62 Cal.App.4th 716, 723.
19

20 If an average person could entertain doubt about the judge’s impartiality, disqualification is
21 mandated. *Catchpole v Brannon* (1995) 36 Cal.App. 4th 237, 246.
22

23 An appellate court will not speculate about whether the bias was actual or merely apparent;
24 reversal is required in such a case, with remand of the matter to a different judge for a new hearing on
25 all issues. *In re Wagner* (2005) 127 Cal.App 4th 138, 147–149; see also *Roitz v Coldwell Banker*
26 *Residential Brokerage Co.*, supra, 62 Cal.App 4th at p. 723; *Catchpole v Brannon*, supra, 36 Cal.App.
27 4th at p. 247.
28

1 One situation in which bias was found involved a judge who interrupted counsel and a litigant
 2 on several occasions. See *Dodds v Commission on Judicial Performance* (1995) 12 Cal.App. 4th 163,
 3 176–177.

4 The numerous instances of bias by Judge Steve Kim toward Amber Doe in this case provide
 5 ample justification for the disqualification of Judge Steve Kim.

6 When the judge has exhibited numerous instances of bias toward a party in the case, such that
 7 the average person might justifiably doubt whether the judge could be impartial, there is ample
 8 justification for disqualifying the judge. *Catchpole v Brannon*, supra, 36 Cal.App. A4th at p. 262.

9 ///

10 III.

11 CONCLUSION

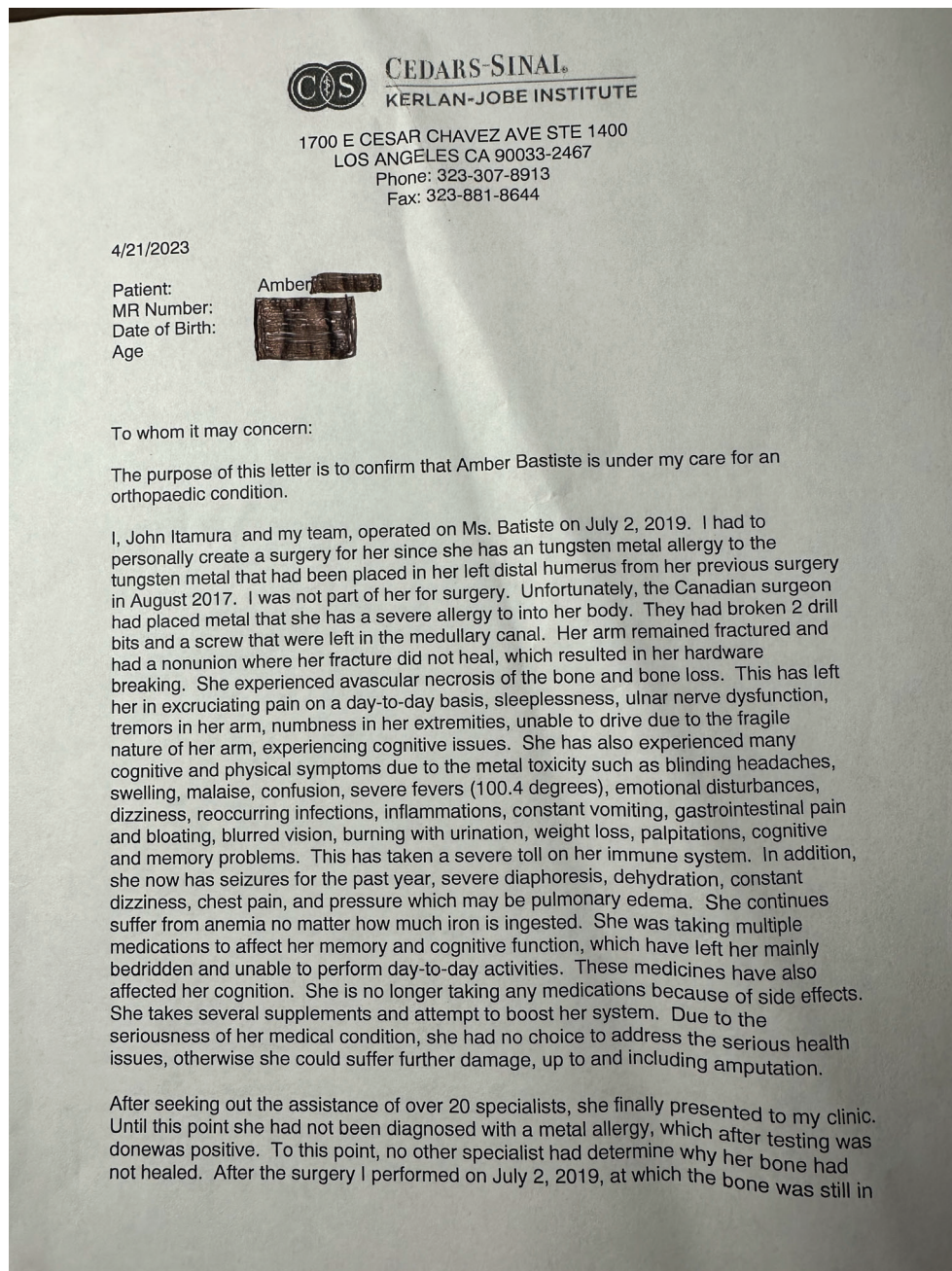
12 Defendant respectfully requests that Judge Steve Kim be disqualified from presiding over any
 13 further proceedings in this case on the grounds Judge Steve Kim has already been Bias in the instant
 14 case allowed the lawyers to obstruct Justice and this only served to delay the trial and to further
 15 endanger Amber Does life. Just Steve Kim has not yet Heard any oral arguments from Amber Doe
 16 nor has he seen Amber Doe nor heard her Voice yet he is already bias. All facts stated herein would
 17 clearly cause anyone aware of the facts to reasonably entertain a doubt that the judge would be able
 18 to be impartial.

19 Dated May 18,2023

20 *Amber Doe*

21 Amber Doe

Exhibit 1





CEDARS-SINAL
KERLAN-JOBE INSTITUTE

the state of complete nonunion, after she was told more than 18 months prior that the bone was healed. She has presented at my office in multiple occasions for follow-up.

I advised her to be on bedrest due to the high risk of potential infection. The operative note has been attached which shows its complexity. The surgery included a bone marrow aspirate from her hip to help the fracture heal. This case is one of the most complex cases I have treated. She had a nonunion for almost 2 years prior to arriving to my clinic in which she had injured the pain from her initial injury and unsuccessful surgery. After the surgery, Ms. Bastiste suffered complications. She sustained an almost 2-week long fever which was treated with antibiotics prescribed by me. As of April 2023 she is experiencing fevers that continues for several days or weeks. The symptoms at this time are almost constant.

She is still experiencing the effects of metal toxicity due to the screws remaining that were unable to be extracted without splitting her distal humerus in half. The damage in her left arm is permanent and the damage from the metal toxicity is as well. She is still in the process of resolving the issues of the metal toxicity under direct guidance from her medical doctors. Ms. Bastiste is being denied health insurance based on her pre-existing conditions two of them being her arm injuries and metallosis. She has to pay cash only for her medical care which limits her access to healthcare since many facilities do not accept cash only patients. In the dozens of surgeons she has met with and being referred to, myself and my team are the only team willing to perform this high risk surgery and try to prevent further damage to her health and possible death. It is extremely rare that any surgeon would leave tungsten drill bits in the patient and not disclose it, removed the surgical record and subsequently state the bone was healed, and send the patient to physical therapy knowing the bone has not healed, deny patient a CAT scan, and state that tungsten is no different than stainless steel.

She is very ill and needs surgery as soon as possible. My team is prepared to operate. I do not advise that it is acceptable that the same surgeon who caused profound damage with operating her again even if supervised.

There is very little research on the effects of tungsten; however, we have attached some research from the UK for your review.

I can be contacted in my office in Los Angeles.

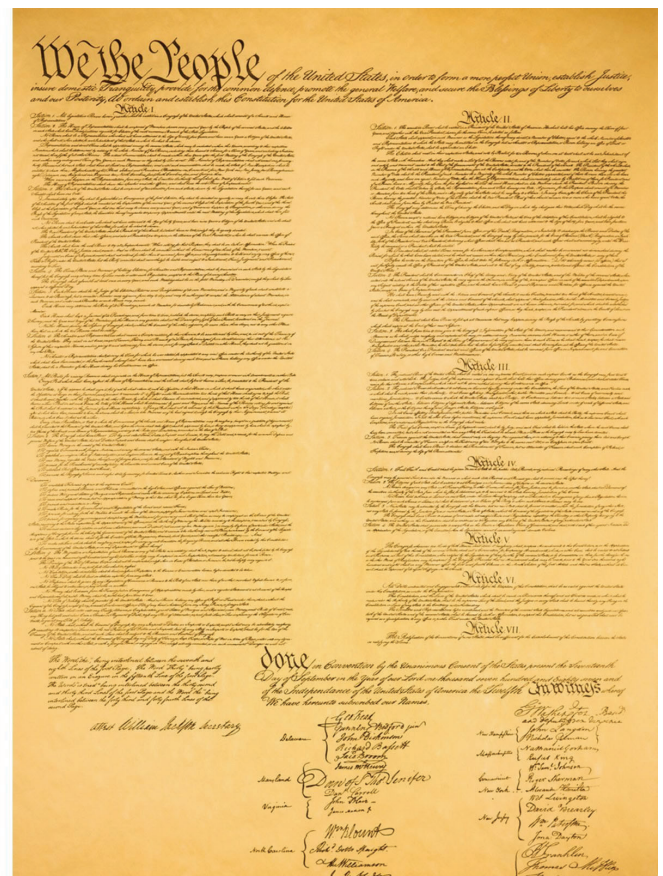
I, John Itamura, MD, and a graduate of USC school of medicine, Los Angeles County plus USC Medical Center internship and residency orthopedic surgery, WB Carol Memorial clinic fellowship in shoulder and elbow surgery, and Massachusetts General Hospital fellowship in hand and upper extremity AO international. I have been in practice for 28 years specializing in shoulder and elbow orthopedic surgery. I am the director of Kerlan-Jobe adult shoulder and elbow reconstruction fellowship.

Sincerely,

John Minoru Itamura, MD

Exhibit 2

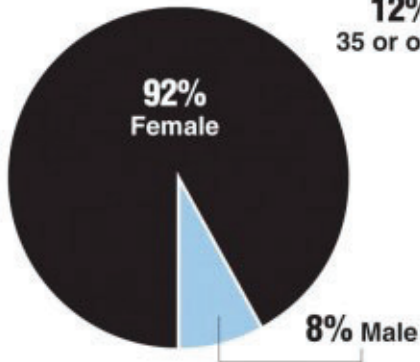




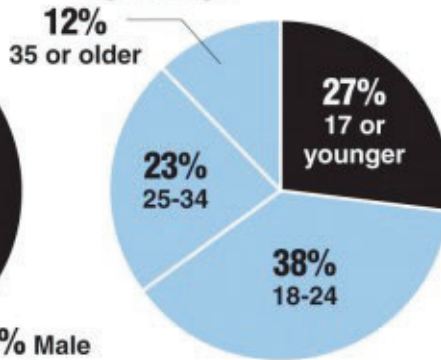
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Who are the victims of human trafficking?

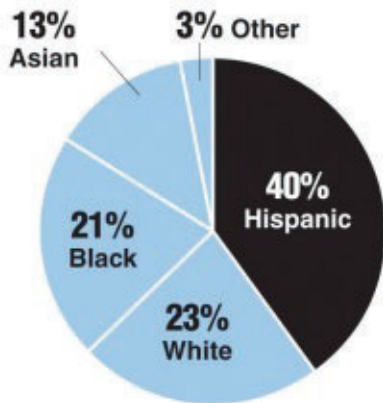
Gender



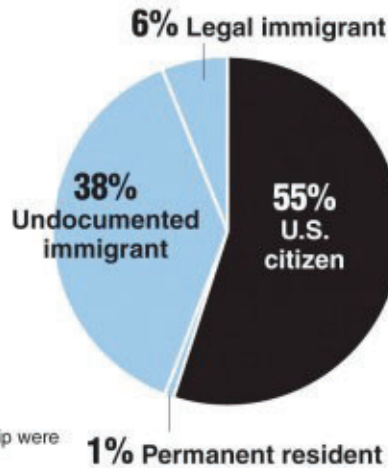
Age range



Ethnic origins



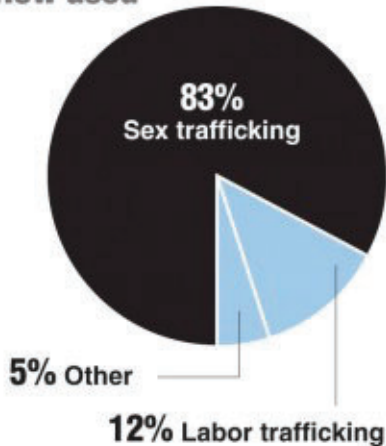
Citizenship



NOTE: Data for age, ethnic origins and citizenship were not reported for about half the reported victims

The work of slavery

How used



Sex trafficking

Forced prostitution



Child sex trafficking



Other



© 2009 MCT

Source: Characteristics of Suspected Human Trafficking Incidents, 2007-08, U.S. Bureau of Justice Statistics, January 2009
Graphic: Dave Eames and Mark Morris, The Kansas City Star

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2
3 Charts showing the victims of human trafficking in the U.S., by gender,
4 age, ethnic origin; includes information on how victims are used.
(Graphic Credit: MCT Campus, The Kansas City Star, 2009)

5 [Lauren J. Mapp](#), Editor-in-Chief

6 November 5, 2012

7 Marie (not her real name) was a 15-year-old girl like many others – she
8 was a soccer player who worked hard in her classes and had dreams of
9 going to college to become a nurse. Unlike many students, though, she
10 had a secret.

11 At home Marie’s stepfather abused her on a regular basis, and after
12 several years of sexual and physical trauma she became too afraid to
13 stand up to him. Her solution was to run away from her family’s home
in Eastlake.

14 “I couldn’t tell my mother because I knew it was gonna break her heart,
15 and I was embarrassed to talk to anyone at school about it,” Marie said.
16 “I got up and left and thought that I’d finally be safe.”

17 Instead of the safety she thought she was running away to, Marie instead
18 found herself alone and hungry on the streets in downtown San Diego,
19 wondering where she would turn next. When Bruce (also a pseudonym)
20 asked her out to dinner, offering to pay, she gladly accepted. She and the
21 32-year-old immediately started dating, but within a few short weeks he
revealed his plan to her for how they could make some quick cash:
22 prostitution.

23 Having no other options, she reluctantly decided to go along with his
24 idea, but Marie soon realized that the emotional turmoil would be more
than she could bear.

25 “The first time was the hardest,” Marie said. “I kept thinking that it was
26 wrong. This man was dirty, sweating, groping me, focused on getting
27 laid and nothing else. I went back to Bruce’s apartment and cried myself
28

1 to sleep, saying I wouldn't do it again, but the next night I was back on
2 the street."

3 America's Finest City is the eighth most prominent U.S. metro area for
4 sex trafficking, according to the FBI (Los Angeles and San Francisco are
5 also in the top 13). It is estimated that as many as 2,500 teenage
6 runaways are in San Diego at any given time, and that most runaway
7 children are approached for sex within 48 hours of being on their own,
8 according to Generate Hope's Director of Development Holly Hepburn.
9 Since 2010, Generate Hope – a San Diego non-profit organization – has
10 been working with women ages 18 to 35 who are victims of sex
11 trafficking, helping them break free from trafficking and reestablish
12 themselves in mainstream society. Although Generate Hope helps
13 victims from all areas, the majority are from San Diego County.
14 "It's very much happening in our cities and in our schools," Hepburn
15 said about sex trafficking-related crimes.

16 Eric Drilling, a vice detective in the San Diego Police Department, said
17 the average age for entering into prostitution is 12 to 13. He said that
18 most local victims of sex trafficking are from the San Diego area.
19 Drilling said people might see girls working on streets known for
20 prostitutes, such as El Cajon Boulevard, and think they are there freely,
21 but that this is often a misconception.

22 "A vast majority of these girls have pimps, and it may appear that
23 they're willing to do this, but there's a lot of psychological coercion that
24 goes into pimping," Drilling said.

25 The Californians Against Sexual Exploitation Act, also known as
26 Proposition 35, is an initiative to fight sex trafficking in California, will
27 be on the ballot Tuesday. If passed, the so-called CASE Act would
28 increase Megan's Law protections against online predators, increase
prison terms for those convicted of sex trafficking and require that law
enforcement agents have sufficient training on human trafficking.

1 The CASE Act would also create fines for convicted criminals. Funds
2 raised from the fines would be used in services to help sex trafficking
3 victims.

4 “I think it’s a good starting point because you’ve got to start
5 somewhere,” Hepburn said about the CASE Act. “It’s a tough subject
6 [and] it’s going to be tough to get [the law] passed. People are just
7 starting to learn about it.”

8 Drilling believes changes in the law such as Prop 35 and increased
9 funding for law enforcement are key to fighting sex trafficking.

10 “I’m a cop. I’m always going to advocate for more money,” he said.

11 “We could double the size of this [vice] unit, and it just means that many
12 more girls off the street and that many more pimps in jail. Sentencing is
13 something that certainly assists us with the goal of locking away people
14 that engage in this activity.”

15 Marie finally got away from Bruce and selling her body, yet many more
16 victims of sex trafficking remain in San Diego. Today, Marie has
17 escaped from both the trauma of her abusive upbringing and the abusive
18 lifestyle of working for Bruce, but many children are still trapped within
19 abusive relationships

20 “I wish that there were options for me when I was being abused by my
21 stepdad,” Marie said. “Other kids [shouldn’t have to] sell their bodies
22 like I did at that age, and I hope that things change so girls can escape
23 from [sex] trafficking easier.”
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2 Trafficking victims are deceived by false promises of
3 love, a good job, or a stable life and are lured or forced
4 into situations where they are made to work under
5 deplorable conditions with little or no pay. In the United
6 States, trafficking victims can be American or foreign
7 citizens. Sep 28, 2022
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